

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S5-4:15CR 404 HEA
)	
MICHAEL GRADY, and)	
OSCAR DILLON, III,)	
)	
Defendants.)	

**THE GOVERNMENT’S MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS’ BRIEF IN SUPPORT OF THEIR
MOTIONS TO DISMISS INDICTMENT**

Comes now the United States of America by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri and Michael A. Reilly, Assistant United States Attorney for the Eastern District of Missouri, and respectfully requests that the Court extend the time for the Government to respond to Defendants’ Brief in Support of Their Motions to Dismiss Indictment [Doc. # 2167, “Defendant’s Brief”]. In support of this motion, the Government states the following:

1. Counsel for the defendants were initially given until March 21, 2019, to file their post hearing brief, giving them approximately 30 days following the filing of transcripts in this matter [Docs. # 2064, 2078, 2079].
2. On March 20, 2019, counsel for the defendants requested an additional seven to ten days to file their brief, and received a filing deadline of April 2, 2019 [Docs. # 2146, 2147].
3. On April 3, 2019, counsel filed their brief of 33 pages, which raises evolving claims

and arguments [Doc. # 2167]. Counsel had approximately six weeks from the filing of the transcript to prepare their extensive Brief.

4. Based upon the length of the brief, the breadth of the record, and the evolving nature of the arguments, the United States requests an extension to April 24, 2019, to respond to Defendants' Brief.

WHEREFORE, the United States requests that this Court grant its Motion for Extension of Time to April 24, 2019, for the reasons stated herein.

Respectfully Submitted,

JEFFREY B. JENSEN
United States Attorney

s/ Michael A. Reilly
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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2019, the foregoing was filed electronically with the Clerk of the Court, and that an electronic copy of the pleading and attachment will be served upon all counsel of record.

s/ Michael A. Reilly
MICHAEL A. REILLY, #43908MO
Assistant United States Attorney